

AR201-11753



2030 DOW CENTER
November 30, 1999

The Dow Chemical Company
Midland, Michigan 48674

VIA CERTIFIED MAIL Z 289 678 907

Carol Browner, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Charles Auer (7405)
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

ATTENTION CHEMICAL RIGHT-TO-KNOW PROGRAM

The Dow Chemical Company and its subsidiary company Hampshire Chemical Corp. produce CASRN 4316-73-8, sodium sarcosinate. The overwhelming bulk of the production of this substance is used for FDA-regulated applications, but because the product is not exclusively sold into FDA-regulated applications, the volume reported under the IUR reflects both the FDA and non-FDA regulated volumes. The volume of this CASRN used for non FDA-regulated applications is less than 50,000 lb/yr. Dow and its subsidiary company Hampshire Chemical Corp. believe this chemical does not meet the volume requirements to be considered within the HPV Challenge.

In addition, CASRN 4316-73-8 should be Exempt from the HPV Challenge for reasons described for Exemption (1) where testing using the SIDS base set would not further the understanding of the chemical's properties.

Sincerely,

Gregory G. Bond
Corporate Director of Product Responsibility

jt

RECEIVED
OPT C21C
1999 DEC -2 PM 3:27

MR 29371